



Amarillo College

November 22, 2021

Docket Management Facility
US Department of Transportation
1200 New Jersey Avenue, SE
West Building Ground Floor
Room W 12-140
Washington, DC 20590

Subject: Petition for extension to exemption, Docket# FAA-2019-0960-004. There have been no changes to the conditions, or limitation of the aforementioned exemption. Our (AM0T064K) Part 147 curriculum manual is current, the OSpec is current, and the processes covering our exemption remain current. Relief from Code of Federal Regulations 14 CFR, Part 65.75(a) to allow the Aviation Mechanic General (AMG) written exam to be administered after successful completion of the corresponding curriculum.

Dear Sir or Madam,

Amarillo College operates an approved Aviation Maintenance Technician School (AMTS) on its Amarillo, TX campus under Air Agency Certificate AM0T064K. The school is seeking an exemption from Title 14 CFR Part 65.75(a).

Title 14 CFR Part 65.75(a), Knowledge Requirements, states that applicants for a mechanic certificate, or rating, must pass a written test after meeting the applicable experience requirements of Part 65.77. Part 65.77 requires that applicants must “present either an appropriate graduation certificate or certificate of completion from a certificated aviation maintenance technician school” to be eligible to take the written exam for a certificate or rating.

Relief being sought

The AMTS at Amarillo College is seeking relief from Title 14 CFR Part 65.75(a) to allow students in its Part 147 program to be able to take the aviation mechanic general (AMG) written test after successfully completing the General curriculum, but prior to meeting the experience requirements of Part 65.77.

Public interest

The public's interest would be served by permitting Amarillo College AMTS students to take their FAA AMG written exam after successful completion of the General curriculum. Amarillo College has established internship with our industry partners. When our students have accomplished the AMG testing requirements they are considered for internship. Our internship allow the student to earn experience and sense of accomplishment. In turn, it would be expected that this would further encourage students to continue studying and be a positive influence to keep students in the program.

Safety impact

An existing procedure is in place to report students who are eligible to take the FAA written, oral, and practical tests to the Lubbock, TX FSDO and a written testing center at Amarillo Rick Husband Airport located at Amarillo, TX. This same procedure would be used to report Amarillo College AMTS students who would be eligible to take the AMG written exam. A level of safety equal to what currently exists would be provided.

Additional information, views, or arguments to support our request

The testing of students immediately after learning is an accepted instructional principle that is both academically sound and reinforces learning. This practice is currently allowed for at the end of both the Airframe and the Powerplant curricula, but not at the end of the General curriculum. Currently, 14 CFR Part 65.80 permits students at an AMTS who have made satisfactory progress at the school to take their oral and practical exams before meeting the applicable experience requirements of Part 65.77.

Amarillo College has partnered with our local industry in creating opportunity for internship. These intern positions allow our industry to fill gaps in the numbers of mechanics available. The internship also provides the industry an opportunity to observe our students in their environments before hiring them and the student get real time experience.

Summary of request for publication in the Federal Register

The purpose of this petition is to allow the Aviation Mechanic General (AMG) written exam to be taken by students in Amarillo College AMTS after successfully completing the General curriculum. The AMTS at Amarillo College is seeking relief from Title 14 CFR Part 65.75(a) which requires students to pass a written test after meeting the applicable experience requirements of Part 65.77.

Amarillo College appreciates your consideration and assistance in granting this petition.

Respectfully submitted,

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cc: Steve Miller, PMI
Lubbock Flight Standards District Office